

Stephen R. Sady, OSB #81099
Chief Deputy Federal Defender
Email: steve_sady@fd.org
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:20-cr-00449-SI

Plaintiff,

v.

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE**

ALEXA DARON GRAHAM,

Defendant.

I, Stephen R. Sady, declare:

1. I represent Alexa Graham who is charged with one count of Aiming a Laser at an Aircraft. Trial is set for May 4, 2021. Ms. Graham is out of custody and in full compliance with the terms of her release.

2. This is the third request to continue a trial date from the parties in this case.

3. The parties have reached a deferred resolution agreement in this case. The agreement requires Ms. Graham to set her trial over to a date beyond the date on which her deferred

resolution agreement will expire on December 19, 2021. If Ms. Graham remains in compliance with the agreement, the government will move to dismiss this case with prejudice on December 19, 2021.

4. The ends of justice served by granting this motion in order to resolve this case outweigh the best interest of the public and defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

5. I have discussed this requested continuance with counsel for the government, Hannah Horsley, and she has no objection to this requested continuance.

6. I have communicated with Ms. Graham, explained the reasons for requesting a continuance, and the rights that she has under the Speedy Trial Act. Ms. Graham agrees with defense counsel's request for a continuance and waives her rights under the Speedy Trial Act.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on March 19, 2021, in Portland, Oregon.

/s/ Stephen R. Sady
Stephen R. Sady
Attorney for Defendant